

EXHIBIT E

RESPONSE:

Interrogatory No. 21: Describe, in detail, whether, during Plaintiff's EDR proceeding or prior to her reclassification to an assistant federal defender, there was sufficient appellate (*i.e.*, non-trial) work to support at least .70 appellate assistant federal defender positions at the FDO, *see, e.g.*, Bates Nos. US856, US4156, and identify any assistant federal defenders employed by the FDO at that time who worked in part-time positions or had less than a full appellate caseload. Identify each part-time attorney and their full-time equivalency (e.g., .75) and the appellate caseload percentage of any attorney performing appellate work (e.g., .75).

RESPONSE:

Interrogatory No. 22: Describe, in detail, the basis for not disqualifying Anthony Martinez (Federal Defender) from Plaintiff's EDR proceeding.

RESPONSE:

Interrogatory No. 23: Identify and describe all final decisions relevant to Plaintiff's EDR proceeding, including, if applicable, citation to documentation of all final decisions (*see, e.g.*, Bates Nos. US628, US1434, US1790, US1794, US1803, US2589, US3302, US4038, US4068, US4073, US5312), associated with each assertion of "Deliberative Process Privilege" by Defendants in their "Privilege Log" served on March 24, 2023, including, if necessary, reference to any document produced in response to Request for Production 82.

RESPONSE: